

WORC

Western Organization of Resource Councils

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Comments from the Western Organization of Resource Councils (WORC) for consideration regarding the Public Meeting; National Animal Identification System (NAIS)

WORC is a regional network of seven grassroots community organizations that include 9,500 members and 45 local chapters. WORC represents farmers, ranchers, and consumers in Colorado, Idaho, Montana, North Dakota, Oregon, South Dakota, and Wyoming. WORC has a long history of supporting family agriculture and fair, open markets. We appreciate the opportunity to comment on the proposed National Animal Identification System.

WORC is opposed to the National Animal Identification System (NAIS) and specifically opposed to the privatization of such a program.

First, we do not believe that a national animal identification program is necessary since mandatory country-of-origin labeling was enacted in the 2002 Farm Bill. WORC is a long-time supporter of mandatory country-of-origin labeling, which requires that only meat that has been born, raised and processed in the U.S. can be labeled as a U.S. product. Since the greatest risk of disease, such as bovine spongiform encephalopathy, is posed from imported cattle and meat products, we do not feel that domestic producers should have to bear the burden of a program such as the NAIS. The NAIS does nothing to prevent the introduction of BSE into the U.S. and does not provide any trace-forward capabilities, only trace-back capabilities, which do not adequately protect consumers. Livestock should be permanently marked with their country of origin before entering the U.S.; and there should immediately be an investigation to identify and mark imported cattle already in the U.S.

Next, WORC believes the extra cost and burden of a privatized or USDA administered NAIS is unnecessary. Any trace-back and identification system is best administered by existing state agencies. National animal identification should build on existing animal health and ownership brand identification programs. For example, the program to identify cattle vaccinated for brucellosis has existed for years, is overseen by USDA's Animal and Plant Health Inspection Service (APHIS) and is administered by state animal health boards. Furthermore, many states have a brand inspection program, which proved to be the most efficient method in locating a Canadian bull from the herd where a cow was discovered to have BSE in May 2003. Inspectors were also able to use these and other existing methods of trace back to identify the recent case of BSE found in the U.S. as a Texas born and raised cow. The brucellosis vaccination and brand inspection programs are both existing, effective methods of trace-back; the NAIS would only be an unnecessary, expensive burden on producers. Therefore, any additional program and the costs incurred should be borne by the Federal government.

Privatization of Animal ID would exacerbate the problems created with a National Animal Identification System. Under the proposed system, collection of proprietary information could occur. Information about how animals are produced could be misused, if it is not strictly controlled. Privatizing such a system would add to the problems of controlling information. Misused information on genetics, management, and other information could be used by meatpackers to discriminate among producers or dictate production practices to the livestock producers. Data collected under any animal identification and trace-back system should be accessible only to state and tribal animal health agencies, APHIS, and Homeland Security, and only for the purposes of official disease investigation. Privatizing the system would compromise the purpose of the program.

In addition, privatizing NAIS would foster profiteering. Such a move would allow livestock commodity organizations and for-profit entities to manage or subcontract for implementation of animal identification systems. A rush to create a new system could create unnecessary costs, paid to private companies and special interest groups for duplicative systems. Any system should be carefully managed in full cooperation and partnership between federal, state and tribal animal health agencies.

The NAIS could expose family farmers and ranchers to unwarranted liability. Under current rules, animal identification information could be used to shift liability for food contamination incidents from packers and processors back to farmers and ranchers. It is vital that livestock producers not bear the liability of claims that occur after the cattle leave the producers' control. Livestock producers should not be liable for claims other than those made by governmental agencies authorized to access data collected under the system.

Having illustrated that there are existing programs that ensure consumer confidence, as well as protect the economic viability of domestic producers, we believe that the only purpose of the NAIS is to further integrate the U.S. cattle industry for the benefit of the meatpacking industry and privatization of such a program would expedite that purpose.

The NAIS would collect proprietary information, which could be misused by meatpackers to discriminate among producers and manipulate the markets. Should a national animal identification plan be implemented, any data collected should be accessible *only* to state animal health agencies and *only* for the purpose of official disease investigation.

For these reasons, WORC is opposed to any form of privatization of the NAIS. Thank you.

Sincerely,
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